

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Diane M. Doolittle (CA Bar No. 142046)
dianedoolittle@quinnemanuel.com
Sara Jenkins (CA Bar No. 230097)
sarajenkins@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
Crystal Nix-Hines (Bar No. 326971)
crystalnixhines@quinnemanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)
josefansorge@quinnemanuel.com
Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

Jomaire Crawford (admitted *pro hac vice*)
jomairecrawford@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Jonathan Tse (CA Bar No. 305468)
jonathantse@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, CA 94111
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et.al*, individually and
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**SUPPLEMENTAL DECLARATION OF
STEPHEN A. BROOME IN SUPPORT OF
GOOGLE, LLC'S MOTION FOR
SUMMARY JUDGMENT**

Hon. Yvonne Gonzalez Rogers
Courtroom: 1 – 4th Floor
Date: May 12, 2023
Time: 1:00 p.m.

1 I, Stephen A. Broome, declare as follows:

2 1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Defendant Google LLC in this matter. I am an attorney at law duly licensed to practice
4 before all courts of the State of California and admitted to practice in the Northern District of
5 California by this Court. I have personal knowledge of the matters set forth herein and am
6 competent to testify.

7 2. Attached as **Exhibit 146** is a true and correct copy of the Declaration of Konstantinos
8 Psounis, dated November 30, 2022.

9 3. Attached as **Exhibit 147** is a true and correct copy of the Declaration of Konstantinos
10 Psounis, dated February 10, 2023.

11 4. Attached as **Exhibit 148** is a true and correct copy of excerpts from the transcript of
12 the deposition of Glenn Berntson, taken on February 14, 2023.

13 5. Attached as **Exhibit 149** is a true and correct copy of excerpts from the transcript of
14 the April 29, 2021 Discovery Hearing.

15 6. Attached as **Exhibit 150** is a true and correct copy of excerpts from the transcript of
16 the deposition of Adrienne Porter Felt, taken on November 16, 2021.

17 7. Attached as **Exhibit 151** is a true and correct copy of excerpts from the transcript of
18 the deposition of Abdelkarim Mardini, taken on November 24 2021.

19 8. Attached as **Exhibit 152** is a true and correct copy of excerpts from the transcript of
20 the deposition of Christopher Palmer, taken on January 5, 2022.

21 9. Attached as **Exhibit 153** is a true and correct copy of excerpts from the transcript of
22 the deposition of Gregory Fair, taken on December 14, 2021.

23 10. Attached as **Exhibit 154** is a true and correct copy of excerpts from the transcript of
24 the deposition of Sabine Borsay, taken on June 30, 2022.

25 11. Attached as **Exhibit 155** is a true and correct copy of excerpts from the transcript of
26 the deposition of Ramin Halavati, taken on January 18, 2022.

27 12. Attached as **Exhibit 156** is a true and correct copy of the Expert Report of Bruce A.
28 Strombom, dated May 27, 2022.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Los Angeles, California on April 26, 2023.

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